



June 1, 2004

U. S. Department of Transportation  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW  
Washington, D. C. 20590-001

RE: Docket No. NHTSA-04-17326

To Whom It May Concern:

USIS is the leading provider of United States Department of Transportation (DOT)-compliant pre-employment screening services in the motor carrier industry. Our 20 years of experience includes assisting the motor carrier industry in its efforts to hire and retain safe and reliable commercial drivers. Although our comments are not directly related to the Notice of Proposed Rulemaking issued by the National Highway Traffic Safety Administration (NHTSA) on March 31, 2004 (NHTSA-04-17326), we strongly believe NHTSA, in its effort to provide information to enhance highway safety, should consider providing enhanced access to driver data in the National Driver Registry (NDR).

In the proposed rule, NHTSA clarifies the definition of “employers or prospective employers” and recognizes their need to access information to make sound hiring decisions. USIS currently provides many of these services through connections with the 51 state licensing agencies and through the Commercial Driver’s License Information System (CDLIS), but would also like to see access enhanced and simplified to NDR for qualified employers under certain purposes, and with a written release from the driver, electronic access to NDR, through approved third party information providers.

Electronic access to NDR, would be an efficient and effective option to the labor intensive, manual process that exists today. A similar process is currently in place with CDLIS and could be used as a model. Currently, FMCSA and the American Association of Motor Vehicle Administrators (AAMVA) allow an employer to electronically access a modified CDLIS record notifying the employer of a driver’s previous states of licensure. This access is available to the employers and prospective employers by approved third party information providers, acting as an agent, or conduit, for company. Similar access to NDR would provide similar benefits; more information that is easily accessible to employers to make sound hiring decisions on drivers.

USIS currently offers information to employers through electronic or other expedited processes including previous employment history, driving records, and criminal records under the strict guidelines of the Fair Credit Reporting Act (FCRA). USIS complies with all Federal and State

laws that provide safeguards to ensure the privacy of information and records. The aforementioned records would be handled in a similar fashion to ensure the privacy and security of personal information.

Thank you for the opportunity to comment. Please feel free to call Kim Bishop at 800-331-9175, ext. 2240 or me at 703-838-7995 with any questions.

Sincerely,

Daniel Shoemaker  
Director, Government & Financial Services